

Author: Alisa D Huckaby at ~HANFORD02A
Date: 5/19/97 4:20 PM
Priority: Normal
TO: Debra A (Debbi) Isom at ~WHC156
Subject: 222-S Laboratory Complex Part A

----- Message Contents -----

Hi Debbi,
Would you please add this cc:mail message to the 222-S Laboratory Complex
Administrative Record? In advance, thank you!
Alisa

Forward Header

Subject: 222-S Laboratory Complex Part A
Author: Alisa D Huckaby at ~HANFORD02A
Date: 5/19/97 4:18 PM



Cliff and Paul,

Feng and I appreciate the opportunity to meet with you both on May 2
to discuss our permit determination of 4-2-97 (transmitted via
cc:mail) regarding the 222-S Laboratory Complex Part A.

This message is sent to summarize the discussion items of May 2, to
propose resolutions and to propose possible meeting dates for further
discussion of this issue.

1) Ecology has concurred with the acceptance of off-site waste where
the waste is comprised of either the return of unused portions of
Hanford samples or the waste generated from analysis of Hanford
samples (as explained in the 4/2/97 cc:mail message).

However, it is Ecology's position (as explained in the 4/2/97 cc:mail
message) that the 219-S tank system constitutes a "pass-through" waste
management system whereby waste is stored and treated in the 219-S
tank system making "the mixed waste more amenable for storage in the
DST System" (DOE/RL-88-21 222-S Laboratory Complex, Rev. 5, 03/04/97,
Page 3 of 20). As such, it is further our position that all waste
accepted by the 219-S tank system is synonymous to that same waste
being accepted by the DST system. As stated in our 4/2/97 message and
during our 5/2/97 meeting, it is our opinion that it would be
inappropriate for the 219-S tank system to accept "off-site" or
non-Hanford waste while the DST tank system only accepts "liquid mixed
waste generated on the Hanford Facility" (DOE/RL-88-21 Double-Shell
Tank System, Rev. 8, 10/01/96, Page 2 of 36).

Finally, we agreed during our 5/2/97 meeting that if the 219-S tank
system were to accept "off-site" or non-Hanford waste, the DST tank
system Part A would first need to be revised to also accept "off-site"
or non-Hanford waste.

2) During the 5/2/97 meeting we discussed Ecology's Second
Responsiveness Summary in relation to the Hanford Site Permit Condition
II.N.1. The Responsiveness Summary's response indicating that Ecology
cannot restrict the receipt of off-site waste contingent upon the
proper management of the waste was referenced. Please note the
wording of the response in which it is indicated that Ecology "cannot

restrict properly managed waste". It is Ecology's position that conditions of non-compliance in relation to the receipt of off-unit waste have been documented and Ecology considers such non-compliance an example of improperly managed waste.

3) During the 5/2/97 meeting, a reference was made to the National Equity Dialogue. In particular, you described the need for DOE to have the flexibility to receive off-site and/or non-Hanford waste. You also acknowledged an agreed upon approach by which a status quota would be maintained until such time as the National Equity Dialogue is advanced.

I indicated the acceptance of "off-site" and/or non-Hanford waste would represent a departure from the status quota established by the approved Part A (DOE/RL-88-21 222-S Laboratory Complex, Rev. 3, 11/04/94) permit in that "off-site" and/or off-unit waste is not currently accepted by the 219-S tank system.

Considering the above items as previously identified and/or discussed, it is proposed that upon Ecology's approval of a DST system and a 219-S tank system Waste Analysis Plan which addresses receipt of "off-site" and/or non-Hanford waste, the respective Part A permits may be revised to reflect this waste management activity. Prior to Ecology's approval of the WAPs, and if DOE wishes to revise the existing Part A to accept additional waste, it is requested the 222-S Laboratory Complex Part A be revised to delineate or define what wastes (unused portions of Hanford samples or wastes generated from the analysis of Hanford samples) may be accepted from off-site. If DOE does not choose to revise the Part A, it is requested the Part A with the applicable language of Rev. 3 (11/04/94) be re-submitted with the change in operator denoted which occurred on October 1, 1996. It should also be noted that Ecology has approved the 03/04/97 proposed TSD unit boundary change (as indicated in the 4/2/97 cc:mail message).

As such, if DOE chooses to accept off-unit waste, the proposed changes associated with the TSD boundary change as reflected by the proposed Part A, Rev. 5 (03/04/97) should also be re-submitted. In addition and if applicable, as indicated in the 4/2/97 cc:mail message, the written justification which explains the need for the revision as required by WAC 173-303-805(7)(a)(iii) is required with the proposed revised Part A permit.

For resolution of this issue, we would very much like to hear from you regarding your decision in relation to the revision of the 222-S Laboratory Complex Part A. If you still feel the need to meet to discuss this issue, Ecology representatives are willing to meet. The proposed dates discussed during the 5/2/97 meeting were May 19, 20, 21, and/or 27. Considering today's date, I propose meeting on May 27.

We look forward to hearing from you.

Alisa Huckaby and Fenggang Ma